

The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

NORTHWEST ENVIRONMENTAL
ADVOCATES,

Plaintiff,

v.

THE U.S. ENVIRONMENTAL
PROTECTION AGENCY,

Defendant.

No. 2:20-cv-01362-MJP

DEFENDANT’S UNOPPOSED
MOTION TO EXTEND DATE TO
RESPOND TO COMPLAINT
AND FILE THE
ADMINISTRATIVE RECORD

NOTED ON MOTION
CALENDAR: December 9, 2020

Defendant, the United States Environmental Protection Agency (“EPA”), requests a four-week extension – from December 16, 2020, to and including January 13, 2021 – of the deadline for filing its response to the Complaint and the deadline for filing the administrative record. Undersigned counsel has conferred with counsel for Plaintiff, who indicated that Plaintiff does not oppose this Motion. In support of this Motion, Defendant states the following:

The current deadline for filing Defendant’s response to the Complaint and administrative record is December 16, 2020. The parties filed a Joint Status Report on November 30, 2020,

Motion to Extend
2:20-cv-01362

U.S. Dept. of Justice
P.O. Box 7611
Washington, D.C. 20044
202-598-3141

1 indicating that Defendant would be seeking an extension to January 13, 2020. Given the
 2 schedules and caseload of undersigned counsel at the United States Department of Justice and
 3 the time necessary to coordinate with EPA on the response to the Complaint, as well as to
 4 assemble and complete review of the documents that comprise the administrative record, an
 5 extension is warranted here under Local Rule 7(j). Defendant therefore requests that the Court
 6 grant a four-week extension, to January 13, 2021, of the deadline to file a response to the
 7 Complaint and to file the administrative record.
 8

9 A proposed form of order is being submitted pursuant to Local Rule 10(e)(7).

10 DATED: December 9, 2020

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7 *Attorneys for Defendants*

8 CERTIFICATE OF SERVICE

9 I hereby certify that on December 9, 2020, I electronically filed the foregoing document
10 with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all
11 counsel of record in this matter.

12 /s/ Elisabeth H. Carter
13 ELISABETH H. CARTER
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